BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268

Postal Rate and Fee Changes, 1997	)))

Docket No. R97-1

THIRD SET OF INTERROGATORIES OF THE ADVERTISING MAIL MARKETING ASSOCIATION TO USPS WITNESS CRUM (AMMA/USPS-T-28-13-19)

Pursuant to Sections 25 and 26 of the Commission's Rules of Practice, the Advertising Mail Marketing Association hereby propounds the attached interrogatories and requests for the production of documents. The instructions contained in our interrogatories to Witness Moeller (AMMA/USPS-T-36-1-3) are incorporated by reference.

If you are unable to provide any of the requested documents or information as to any of the interrogatories, please provide an explanation for each instance in which documents or information cannot be or have not been provided. If the witness to whom this request is directed cannot respond, but another witness can, please redirect the request to that witness.

Respectfully submitted,

Ian D. Volner
N. Frank Wiggins
Counsel to Advertising Mail Marketing
Association

The following questions refer to the densities used to compute the cubic feet of mail in Table 3 of Exhibit K (formerly LR-H-108).

    a. Please confirm that the density used for all Standard (A) letters, regardless of subclass, was 28.4219 pounds per cubic foot and that this density was the average for all "Third Class Bulk Regular Letters" from MC95-1: LR-MCR-13. If you cannot confirm please provide to correct value(s) and source(s).

    b. Please confirm that the density used for all Standard (A) flats, regardless of subclass, was 20.6526 pounds per cubic foot and that this density was the average for all "Third Class Bulk Regular Flats" from MC95-1: LR-MCR-13. If you cannot confirm, please provide the correct value(s) and source(s).

    c. Please confirm that the density used for Standard (A) ECR parcels is 4.4 pounds per cubic foot and was taken from MC95-1: LR-MCR-13. If you cannot confirm, please provide the correct value and source.

    d. Please confirm that the density used for Standard (A) Nonprofit ECR parcels is 11.03 pounds per cubic foot and was taken from MC95-1: LR-MCR-13. If you cannot confirm, please provide the correct value and source.

    e. Please confirm that the density used for Regular Non-Carrier Route parcels is 8.18 pounds per cubic foot and was taken from MC95-1: LR-MCR-13. If you cannot confirm, please provide the correct value and source.

    f. Please confirm that the density used for Nonprofit Non-Carrier Route parcels is 13.36 pounds per cubic foot and was taken from MC95-1: LR-MCR-13. If you cannot confirm, please provide the correct value and source.

g. Please provide the standard errors for each of the density estimates shown in parts a through f.

AMMA/USPS-T-28-14

Please confirm that MC95-1: LR-MCR-13 (Supplement 1) estimated the average density for parcels in "Third Class Bulk Regular" as 14.9254 pounds per cubic foot. If you cannot confirm please provide the correct information.

AMMA/USPS-T-28-15

Please describe in detail the design and execution of the sampling study that developed densities in MC97-2: LR-PCR-38, including but not limited to:

a. The study objectives;

b. The universe of study;

c. The frame;

d. Stratification;

e. Sample size by stratum;

f. The assumed standard deviations of the variables and desired reliability of the estimates that were used in determining the sample size(s);

g. Who designed and carried out the study; and,

h. The period of time over which the observations were taken.

AMMA/USPS-T-28-16

Please explain why you used the densities from MC97-2: LR-PCR-38 for parcels and the densities from MC95-1: LR-MCR-13 for letters and flats.

AMMA/USPS-T-28-17

The following questions apply to MC97-2: LR-PCR-38, referenced as the source of the densities used in Table 3 of Exhibit K.

    a. Please confirm that the densities of parcels in Standard (A) ECR and Non-Carrier come from EXCEL worksheet Pchar3c.xls: Girth. If you cannot confirm, please provide to correct information.

    b. Please provide identification and description for each code used in columns A and B, lines 27 through 54 of Pchar3c.xls: Girth.

    c. Please define the "Height/Width Aspect Factor" used to compute densities and the source of its value, "0.148."

    d. Please provide a verbal description of the logic used in the computation of densities using the "Height/Width Aspect Factor."

    e. Was a "Height/Width Aspect Factor" used in estimating the densities of flats and/or letters in MC95-1: LR-MCR-13.

    f. If your answer to part e is no, please explain why one study used this factor and the other did not.

AMMA/USPS-T-28-18

Please provide the reason(s) why the study design in MC95-1: LR-MCR-13 was not repeated when developing the data for Exhibit K.

AMMA/USPS-T-28-19

Please provide the reason(s) why the study design in MC97-2: LR-PCR-38 Appendix C was not repeated when developing the data for Exhibit K.

CERTIFICATE OF SERVICE

I hereby certify that I have on this date served this document upon all participants of

record in this proceeding in accordance with section 12 of the rules of practice.

DATE: November 14, 1997

N. Frank Wiggins

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